

Message Text

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ORIGIN EPA-04

INFO OCT-01 IO-14 ISO-00 SCI-06 AEC-11 ACDA-19 CIAE-00

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FM SECSTATE WASHDC

TO USMISSION IAEA VIENNA

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E.O. 11652: N/A

TAGS: TECH, IAEA, SENV

SUBJ: COMMENTS ON MARCH 19, 1974, IAEA DRAFT RECOMMEN-
DATIONS FOR OCEAN DUMPING OF RADIOACTIVE WASTES

REFS: (A) STATE A-9894 11-30-73 (B) IAEA VIENNA 10184
12-11-73 (C) STATE A-24 1-17-74 (D) STATE A-120
3-7-74 (E) STATE 86428 4-26-74.

1. FOLLOWING ARE EPA COMMENTS PROMISED REF (E).

A. SECTION 1.3 (2), PAGE 3:

THE LAST TWO LINES OF ITEM (2) ARE STILL UNACCEPT-
ABLE. REF (C) ENCLOSING THE LETTER TRANSMITTING THE U.S.
GOVERNMENT COMMENTS TO THE DIRECTOR GENERAL OF IAEA STATED
OUR CONCERN WITH THESE TWO LINES AND SUGGESTED ALTERNATIVE
LANGUAGE. THEREFORE, WE RECOMMEND THESE TWO LINES BE
DELETED AND URGE THAT SECTION 1.3, ITEM (2) BE REVISED TO
READ, "TO STATE THE RECOMMENDATIONS OF THE INTERNATIONAL
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ATOMIC ENERGY AGENCY CONCERNING THE ISSUE OF SPECIAL PERMITS

FOR THE DUMPING OF RADIOACTIVE WASTES OR OTHER RADIOACTIVE MATTER AS REQUIRED FOR MATERIALS LISTED IN ANNEX II TO THE CONVENTION, RECOMMENDATIONS LIMITED AT THIS TIME TO DEEP-OCEAN DISPOSAL FROM SURFACE VESSELS OF PACKAGED SOLID AND LIQUID MATERIALS."

SECTION 1.3, PAGE 3, LAST PARAGRAPH:

WE REITERATE THE U.S. COMMENTS PER REF (A), PAGE 3 AND REF (C), PAGE 1. PARAGRAPH IN QUESTION REFERS TO A BURIAL TECHNIQUE WHICH NOT ONLY IS TECHNICALLY UNFEASIBLE AT THIS TIME BUT, IF IT WERE, IS DECLARED TO BE EXCLUDED FROM SCOPE OF DRAFT RECOMMENDATIONS. SECTION 1.3 SHOULD BE LIMITED TO THOSE ITEMS SPECIFICALLY WITHIN SCOPE OF THIS DOCUMENT.

B. SECTION 1.4:

THIS SECTION NEEDS TO BE RESTRUCTURED AND DOES NOT APPEAR TO BE COMPREHENSIVE. THE DISTINCTION BETWEEN PACKAGING AND CONTAINMENT SYSTEM IS NOT CLEAR. IT WOULD APPEAR CONTAINMENT SYSTEM IS INCLUSIVE OF A PACKAGE WHICH IS, IN TURN, INCLUSIVE OF PACKAGING, BUT THE ORDER OF PRESENTATION DOES NOT MAKE THIS EVIDENT.

THE DEFINITION OF A CONTAINMENT SYSTEM NEEDS REVISION. CONTAINMENT SYSTEM SHOULD NOT ONLY MEAN COMPONENTS OF PACKAGING SPECIFIED BY THE DESIGNER, BUT MORE IMPORTANTLY, IT SHOULD MEAN COMPONENTS REQUIRED BY THE APPROPRIATE NATIONAL AUTHORITIES TO RETAIN THE RADIOACTIVE MATERIAL DURING THE TRANSPORT, DUMPING, AND DESCENT TO THE SEAFLOOR. IT IS NOT UNTIL PAGE 14, SECTION 2.8, THAT IT IS MADE CLEAR THAT "UPON IMMERSION, THE WASTE MATERIALS (SHOULD) REACH THE SEA BED WITHOUT BEING DISPERSED."

THE DEFINITION OF PACKAGING INCLUDES A SERIES OF POSSIBLE COMPONENTS INCLUDING SPACING STRUCTURES AND RADIATION SHIELDING DEVICES. HOWEVER, PACKAGING MAY ALSO CONSIST OF A MATRIX OF IMMOBILIZING MATERIALS SUCH AS CONCRETE OR BITUMEN. THUS, WHILE IT IS FUNCTIONING PERHAPS AS RADIATION SHIELDING, IT MAY BE INCORPORATED IN THE PACKAGING FOR AN ENTIRELY DIFFERENT PURPOSE, FOR EXAMPLE TO UNCLASSIFIED

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REDUCE THE LEACH RATE AFTER IMMERSION. WE SUGGEST THE ADDITION OF THIS COMPONENT TO THE DEFINITION OF PACKAGING TO READ, E.G., "IT MAY, IN PARTICULAR, CONSIST OF ONE OR MORE RECEPTACLES, ABSORBENT MATERIALS, IMMOBILIZING MATERIALS, SPACING STRUCTURES,..."

C. SECTION 2.2, PAGE 7:

REGRET CANNOT AGREE TO CONTINUED INCLUSION FOURTH

SENTENCE OF FIRST FULL PARAGRAPH ON PAGE 7, BEGINNING
"SINCE THE CONVENTION DOES NOT..." WE SEE NOTHING IN THIS
STATEMENT WHICH PROVIDES SUBSTANCE TO SECTION 2.2, THE
BASIS OF THE DEFINITION. SENTENCE SEEMS TO BE RECOMMENDING
SURFACE OR SHALLOW WATER UNPACKAGED WASTE DISPOSAL IN SPITE

OF NEED FOR MORE STRINGENT LIMITS WHICH ARE CURRENTLY
DEEMED IMPOSSIBLE TO ARRIVE AT IN PRECEDING SENTENCES OF
PARAGRAPH. ALSO VERY DIFFICULT TO DETERMINE AN "APPRO-
PRIATE ENVIRONMENTAL EVALUATION" IN A PERMIT REVIEW WITHOUT
GUIDANCE ON WHAT CONSTITUTES MORE STRINGENT CONDITIONS
RELATIVE TO DEEP SEA DUMPING. U.S. POSITION CLEAR ON THIS
SUBJECT PER REF (A), PAGE 4 AND REF (C), PAGE 2. REF (B),
ITEM 8, ACCEPTED SUGGESTION FOR DELETION OF THIS TROUBLE-
SOME STATEMENT ADVISING THAT THE SUGGESTION WOULD BE
REFLECTED IN THE REDRAFT.

D. SECTION 2.2, PAGES 8 AND 9, AND SECTION 3.1 (2);
NUMERICAL DERIVATIONS FOR 226-RA UNDER FIRST AND
SECOND PARAGRAPHS ON PAGE 8 AND SECOND FULL PARAGRAPH ON
PAGE 9, AND DEFINITION ON PAGE 18 SHOULD BE SLIGHTLY MODI-
FIED TO READ "CI/YEAR FOR WASTES CONTAINING 226-RA." THIS
IS MERELY A POINT OF CLARIFICATION TO BE CONSISTENT WITH
REFERENCES (1) AND (2) IN DRAFT RECOMMENDATIONS.

E. SECTION 2.2, PAGE 9:
LAST SENTENCE, THIRD FULL PARAGRAPH, "EXPRESSING
THE DEFINITION AS..." SHOULD BE DELETED. REF (A), PAGE 5,
AND REF (C), PAGE 4, GAVE U.S. POSITION ON THIS PARTICULAR
STATEMENT. SWEDISH CONVEYED SAME CONCERN TO THE DIRECTOR
GENERAL OF IAEA ON DEC. 20, 1973, I.E., REDUCE GROSS MASS
OVER WHICH THE ACTIVITY CONCENTRATIONS ARE AVERAGED FROM
ONE HUNDRED TONNES TO TEN TONNES. AS REFLECTED IN IAEA
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PRELIMINARY STAFF ANALYSIS ENCLOSURE TO REF (D), THIS WOULD
RESULT IN AN ORDER OF MAGNITUDE DECREASE IN THE MAXIMUM
ACTIVITY CONCENTRATION IN A DISPOSAL CONTAINER. THIS MIGHT
IN TURN REDUCE THE RELATIVE RISK INVOLVED IN PREPARING AND
HANDLING SUCH CONTAINERIZED WASTE AS WELL AS TO BETTER
INSURE T
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